

Remarks

Claims 22-44 are pending in this application. Applicants have amended claims 26, 27, 28, and 31 and added claim 44 to clarify the present invention. Applicants respectfully request favorable reconsideration of this application.

Applicants have amended claim 27 to address the objection. The amendment to claim 27 is supported by the specification at the second paragraph on page 7 and the paragraph bridging pages 24 and 25. Applicants respectfully request withdrawal of the objection to claim 27.

The Examiner rejected claim 26 under 35 U.S.C. § 112, second paragraph. Claim 26 no longer recited the term "powerful" and claim 27 no longer recites the exemplary embodiment. Applicants submit that claims 26-28 comply with 35 U.S.C. § 112, second paragraph, and respectfully request withdrawal of this rejection.

The Examiner rejected claims 22-25 and 29-36 under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent 5,223,090 to Klungness et al. in view of U.S. patent 6,416,727 to Virtanen and Smook. The Examiner rejected claims 26-28 and 37-43 under 35 U.S.C. § 103(a) as being unpatentable over Klungness et al. in view of Virtanen and Smook and further in view of WO 96/18454.

The combination of Klungness et al. Virtanen and Smook does not suggest the present invention as recited in claims 22 or 37 since, among other things, the combination does not

suggest dispersing a fiber suspension in drops or particles in a precipitation reactor. It would not have been obvious to combine Klungness and Virtanen since, among other things, Virtanen does not suggest a method that includes fibers or a fiber suspension. In fact, the invention as recited in claims 22 or 37 includes forming, activating, and dispersing a fiber suspension, utilizing the fiber suspension in a precipitation. On the other hand, as discussed at col. 1, lines 20-23, Virtanen suggests that precipitated calcium carbonate obtained from the process can be used as a paper filling or coating agent. Therefore, Virtanen suggests a conventional use of filler particles. Thus, Virtanen does not reveal anything which would lead one skilled in the art to apply the process in fibers. In fact, the word "fiber" does not appear anywhere in the specification of Virtanen.

Additionally, the invention as recited in claims 22 or 37 provides unexpected and beneficial results, which are described in the specification. The unexpected results include that the filler content of the paper may be greater than in conventional papers as described at page 3, fifth paragraph of the published international application of which the present application is the national phase, which corresponds to page 1, paragraph 0018 in US 2007/0131360, which is the publication of the present application. The method recited in claims 22 or 37 also makes possible extremely fast and complete precipitation reactions, as described at the paragraph bridging pages 5 and 6 of the published international application, which corresponds to page 2, paragraph 0030 of US 2007/0131360. These benefits are not apparent from the combined teachings of Klungness and Virtanen. Thus, the present method produces unexpected results. These benefits are achieved at least in part through the differences between the present invention and the cited reference, which were recognized by the Examiner. For example, dispersing the

fiber suspension in drops or particles in the precipitation reactor is one key to the above-described unexpected and beneficial results.

Smook only suggests calendering, sizing and coating, which do not overcome the deficiencies of Klungness and Virtanen and does not provide any teaching, motivation or suggestion to combine Klungness and Virtanen or the expected results achieved according to the invention as recited in claim 22. WO 96/18454 only suggests a speed at which a pin mill may be operated, which does not provide any teaching, motivation or suggestion to combine Klungness and Virtanen or the expected results achieved according to the invention as recited in claims 22 or 37.

In view of the above, the references relied upon in the office action, whether considered alone or in combination, do not suggest patentable features of the present invention. Therefore, the references relied upon in the office action, whether considered alone or in combination, do not make the present invention obvious. Accordingly, Applicants submit that the present invention is patentable over the cited references and respectfully request withdrawal of the rejections based on the cited references.

If an interview would advance the prosecution of this application, Applicants respectfully urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit

overpayment associated with this communication to Deposit Account No. 22-0261.

Dated: July 11, 2008

Respectfully submitted,

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